REMARKS

In an Office Action mailed on December 28, 2006, the Examiner had: (1) rejected claims 1-16 under 35 U.S.C. § 112, second paragraph, as being incomplete for omitting essential elements; (2) rejected claims 1, 5, 8, 13, and 15 under 35 U.S.C. § 102(b) as being anticipated by Yoshida (U.S. Pat. No. 5,870,596); (3) rejected claims 1-16 under 35 U.S.C. § 103(a) as being obvious over a combination of Yoshida and Honma (U.S. Pat. No. 4,903,195); (4) rejected claims 1-23 as being anticipated by Hinds et al. (U.S. Pat. No. 6,170,001); and (5) rejected claims 1, 5, 8, 10, and 15 under 35 U.S.C. § 102(b) as being anticipated by Inagami et al. (U.S. Pat. No. 4,760,545).

Applicant filed a response on March 20, 2007, to address these rejections. The Examiner issued another Office Action on May 29, 2007, stating that the Applicant's response was "non-responsive." While Applicant respectfully disagrees with the Examiner's characterization of the Applicant's response, to expedite the prosecution of this case Applicant submits additional remarks. Applicant respectfully requests the Examiner to enter these additional remarks into the record and consider these remarks in addition to previously filed amendments and remarks prior to issuing the next Office Action.

The Examiner specifically deemed the previously filed response "non-responsive" because according to the Examiner, Applicants provided "[n]o specific discussions regarding the teaching of Honma, nor the response to the specific discussions of elements of the references and the reasons to combine … ." By this Supplemental Response, Applicant cures these alleged deficiencies in Applicant's previous response.

With respect to the rejection of claims 1-16 under 35 U.S.C. § 103(a) as being obvious over a combination of Yoshida and Honma, Applicant respectfully submits that as discussed in the previously filed response, Yoshida fails to teach each and every limitation of these claims and Honma does not cure the deficiency of teachings of Yoshida. In particular, Honma does not teach or suggest wherein the at least one of the one or more instructions provides a first offset between data elements within a first portion of successive data elements to be stored into the memory or loaded from the memory and a second offset between a first portion and a second portion of the data elements to be stored into the memory or loaded from the memory. In contrast, Honma relates to a method for controlling data transfer between a disk drive and a CPU based on

commands issued from the CPU. (col. 1, ll. 8-12). As part of this method, Honma teaches a "DEFINE EXTENT command [which] specifies an operable range on the DKU [the disk drive]." (col. 2, ll. 63-66). Honma, however, fails to teach or suggest the aforementioned limitation of claims 1-16. Thus, even if combined, which they cannot be, the combination of Yoshida and Honma does not render claims 1-16 unpatentable.

Moreover, there is no evidence of a suggestion to combine the two references, except hindsight. Yoshida, unlike Honma, which relates to controlling data transfers between a CPU and a disk drive, relates to a data processor with multifunction instructions. The LDM instruction of Yoshida relates to loading six 4-byte data from a stack area onto six general purpose registers. The "DEFINE EXTENT" command of Honma relates to specifying an operable range on a disk drive. There is no additional detail in Honma related to the "DEFINE EXTENT" command. Combining the LDM instruction with the "DEFINE EXTENT" command can only occur based on improper hindsight, since Applicant respectfully submit that these teachings by themselves or based on any reasonable interpretation by a person of ordinary skill in the art provide no motivation to combine, as alleged by the Examiner. Accordingly, Applicant respectfully requests the Examiner to withdraw the rejection of claims 1-16 under 35 U.S.C. § 103(a) as being obvious over a combination of Yoshida and Honma.

Accordingly, for at least these additional reasons given above, Applicant respectfully requests allowance of pending claims 1-23. Should issues remain that might be subject to resolution through a telephonic interview, the Examiner is requested to telephone the undersigned at (512) 996-6839. If Applicant has overlooked any additional fees, or if any overpayment has been made, the Commissioner is hereby authorized to credit or debit Deposit Account 503079, Freescale Semiconductor, Inc.

Respectfully submitted,

SEND CORRESPONDENCE TO:

Freescale Semiconductor, Inc.
Law Department

Customer Number: 23125

By: /Ranjeev Singh/
SINGH, RANJEEV
Attorney of Record
Reg. No.: 47,093
Telephone: (512) 996-6839
Fax No.: (512) 996-6854